

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ULYSSES RODRIGUEZ CHARLES,

Plaintiff,

V.

CITY OF BOSTON, et al.,

Defendants.

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) **C.A. No. 04-10986-NG**

**ASSENTED-TO MOTION TO REPLACE
COMPLAINT WITH REDACTED COMPLAINT**

Plaintiff Ulysses Rodriguez Charles hereby respectfully moves this Court to replace the Complaint presently filed with the Court with a redacted copy of the Complaint attached hereto at Exhibit 1. As grounds for this motion, Mr. Charles states as follows:

1. The Complaint presently filed with the Court contains the last names of the victims of the sexual assault crimes that are, in large part, the subject of this lawsuit.
2. At the request of counsel for one of the victims, Mr. Charles agreed to petition the Court to replace the Complaint presently on file with the Court with the attached Complaint in order to safeguard the identity and privacy of the victims. The attached Complaint simply redacts the last names of the women and does not differ in substance from the Complaint presently on file, although it does correct a few typographical errors.
3. Counsel for Defendants assents to the relief requested in this motion.

WHEREFORE, Mr. Charles respectfully requests that the Court grant the relief requested herein and replace the Complaint presently on file with the redacted Complaint attached hereto at Exhibit 1.

Dated: June 18, 2007

Respectfully Submitted,

/s/ Mayeti Gametchu

Kevin J. O'Connor (BBO# 555250)

Mayeti Gametchu (BBO# 647787)

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Attorneys for Plaintiff

ULYSSES RODRIGUEZ CHARLES

CERTIFICATE OF CONFERRAL PURSUANT TO L.R.7.1(a)(2)

I, Mayeti Gametchu, hereby certify that, on June 15, 2007, I conferred with, Thomas Donohue, counsel for Defendants, in good faith and informed him of Plaintiff's intent to file the redacted Complaint. Mr. Donohue assents to the relief requested herein.

CERTIFICATE OF SERVICE

I, Mayeti Gametchu, hereby certify that on June 18, 2007, I served a true and accurate copy of the forgoing document electronically to the registered participants of the ECF system, as identified on the Notice of Electronic Filing (NEF), by filing it through the ECF system, and by first class mail to those persons indicated as non-registered participants.

/s/ Mayeti Gametchu